


# County Superintendent of Schools Phillips County, Montana

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Via Electronic Filing

Chairman Kevin Martin  
Commissioner Michael J. Copps  
Commissioner Jonathan S. Adelstein  
Commissioner Deborah Taylor Tate  
Commissioner Robert M. McDowell

Federal Communications Commission  
455 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Universal Service (CC Docket No. 96-45); DA 07-4719  
Triangle Communication System, Inc. Petition for FCC  
Agreement to Redefine the Study Areas of Two Rural Telephone  
Companies in Montana

Dear Chairman and Commissioners:

I am contacting you on a matter that is vital to rural Montana. It concerns a pending proceeding before the Federal Communications Commission (FCC).

Triangle Communication System, Inc. (TCS), a small, rural wireless telecommunications provider based in rural Montana, has requested redefinition of certain telephone company service areas, so that it may implement its plans to deploy wireless communications throughout its 800 MHz licensed area. The telephone exchanges falling within that FCC licensed area are Dodson, Harlem, Malta, Chester, Chinook, Hays, South Malta, South Malta (N), Turner and Whitewater.

I live and work within the Malta and South Malta area. I am the County Superintendent of Schools in Phillips County, Malta, Montana. Some of my duties include but not limited to: general supervision of the public schools, the transportation of students to/from school, the supervision and evaluation of certain teachers in rural schools and the visitation in other schools.

There are eight schools in my county. Four of the schools have busses that pick up the children. There are three one-room schools in Phillips County with one teacher and a student population in each school ranging between one and six students. In Phillips County we have over 1,500 miles of gravel and dirt roads. Most of the residents in our county travel these roads.

The school district trustees and I share in the concern for the safety of the children when traveling these distances in our remote areas on the bus. Some of these children who ride the bus are on the bus for over two hours each day. The cell phone service is very poor or nonexistent in most of the bus route areas.

The teachers travel these same roads to school and need cell phone service if they encounter an emergency. When I visit the schools, I would like to be in contact with the school or my family if I should have a flat tire, accident or other emergency.

To further explain the remoteness of our area, the distance from Malta, the county seat, to each of the rural schools exceeds 40 miles. Many families travel over 60 miles or more to get groceries. Malta has a small medical facility and some retail stores. Most families travel over 240 miles for medical care and shopping. Many of those miles do not have cell phone service. The ranchers and farmers in our area spend many hours on the open prairies never seeing another person or homestead for many miles.

Most people enjoy the solitude and remoteness. The rural families are good neighbors and look out for one another. However, they should also have the benefit of cell phone service in emergencies, to conduct business when out on the range, and to keep in touch with their children driving to school and school functions.

I am unaware of any other provider that has made a commitment to build facilities in the rural areas of Phillips County. Our county needs better cell phone service. The safety of the children and teachers is important to me and they need to have cell phone service.

The Montana Public Service Commission has determined that it is the public interest to grant TCS's petition to redefine the service areas. I urge you to concur with the decisions of the State Commission so that TCS may

receive federal universal service funds enabling it to deploy wireless service within the identified exchanges.

It is vital that those who live and work in these exchanges have access to telecommunications service that is comparable to that provided in urban areas.

Sincerely,

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